

JONES DAY
222 East 41st Street
New York, New York 10017
Telephone: (212) 326-3939
Facsimile: (212) 755-7306
Corinne Ball (CB 8203)
Richard H. Engman (RE 7861)

JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
Heather Lennox (HL 3046)
Carl E. Black (CB 4803)
Ryan T. Routh (RR 1994)

JONES DAY
1420 Peachtree Street, N.E.
Suite 800
Atlanta, Georgia 30309-3053
Telephone: (404) 521-3939
Facsimile: (404) 581-8330
Jeffrey B. Ellman (JE 5638)

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11
	:	
Dana Corporation, et al.,	:	Case No. 06-10354 (BRL)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

**COUNTERDESIGNATION OF DEBTORS AND DEBTORS IN POSSESSION
IN RESPONSE TO FORGE PRECISION COMPANY'S STATEMENT OF ISSUES
ON APPEAL AND DESIGNATION OF RECORD RESPECTING MEMORANDUM
DECISION GRANTING SUMMARY JUDGMENT DISALLOWING CLAIM**

TO THE HONORABLE BURTON R. LIFLAND,
UNITED STATES BANKRUPTCY JUDGE:

Dana Corporation and 40 of its domestic direct and indirect subsidiaries, as debtors and debtors in possession (collectively, the "Debtors"), respectfully file this Counterdesignation,¹ pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, in response to Forge Precision Company's Statement of Issues on Appeal and Designation of Record Respecting Memorandum Decision Granting Summary Judgment Disallowing Claim (Docket No. 7366) (the "Forge Precision Designation of Record"). For their Counterdesignation, the Debtors state as follows.

**COUNTERDESIGNATION OF ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL²**

Item #	Docket #	Description
1	4044	Order Establishing Claims Objection and Settlement Procedures, entered on November 9, 2006
2	5985	Objection of Debtors and Debtors in Possession Seeking to Disallow Claim of Forge Precision Company (the " <u>Objection</u> "), ³ filed on August 17, 2007
3	6003	Certificate of Mailing of the Objection, filed on August 22, 2007
4	6526	Notice of Agenda of Matters Scheduled for October 17, 2007 at 10:00 a.m., filed on October 12, 2007
5	6566	Notice of Amended Agenda of Matters Scheduled for October 17, 2007 at 10:00 a.m., filed on October 16, 2007

¹ Concurrently herewith, the Debtors are filing the Motion of Debtors and Debtors in Possession for an Order Striking Certain Items from the Designation of Record on Appeal Filed by Forge Precision Company and Instructing the Clerk of the Court to Exclude Such Items from the Record to Be Transmitted to the District Court (the "Motion"). The Motion seeks to strike certain items (defined in the Motion as the "Ineligible Items") designated for the appellate record by Forge Precision Company ("Forge Precision"), but that were not before this Court. If the Court denies the Motion, the Debtors reserve their rights to supplement this Counterdesignation to include any other items that the Debtors may consider necessary or appropriate to complete the appellate record in response to the Ineligible Items.

² All items designated herein by the Debtors include all exhibits, attachments or other papers included within each docket entry for such item.

³ The Forge Precision Designation of Record also designates the Objection, but it is ambiguous with respect to whether Forge Precision intended to designate all exhibits attached to the Objection.

Dated: December 17, 2007
New York, New York

Respectfully submitted,

s/Corinne Ball

Corinne Ball (CB 8203)
Richard H. Engman (RE 7861)
JONES DAY
222 East 41st Street
New York, New York 10017
Telephone: (212) 326-3939
Facsimile: (212) 755-7306

Heather Lennox (HL 3046)
Carl E. Black (CB 4803)
Ryan T. Routh (RR 1994)
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212

Jeffrey B. Ellman (JE 5638)
JONES DAY
1420 Peachtree Street, N.E.
Suite 800
Atlanta, Georgia 30309-3053
Telephone: (404) 521-3939
Facsimile: (404) 581-8330

ATTORNEYS FOR DEBTORS AND
DEBTORS IN POSSESSION